

October 17, 2016

Ms. Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street NW
Washington, DC 20554

Re: Broadband Privacy NPRM, WC Docket No. 16-106

Dear Ms. Dortch:

On October 13, 2016, Peter Kosmala of the 4A's, Dan Jaffe of the ANA, Emmett O'Keefe of the DMA, Dave Grimaldi of the IAB, and Rob Hartwell of the law firm Venable LLP, met with Nick Degani, Legal Advisor, Wireline, Office of Commissioner Ajit Pai.¹

During this meeting, the participants discussed the Federal Communications Commission's ("FCC") Notice of Proposed Rulemaking ("NPRM") regarding broadband privacy, as well as the recently released Fact Sheet from Chairman Wheeler's office. The parties discussed the Fact Sheet's de-identification standard, its definition of Sensitive Data, and data breach notification requirements. The trade associations discussed how the Fact Sheet's Sensitive Data definition diverges from the Federal Trade Commission's privacy framework by including web browsing and application use data in the Sensitive Data category, and stressed that the industry self-regulatory approach to Sensitive Data strikes a better balance.

Sincerely,

/s/ Rob Hartwell

Cc: Nick Digani

¹ This disclosure is made in compliance with 47 C.F.R. § 1.1206.